

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION**

CONGHUA YAN,

Civ. Action No. 4:23-cv-00758-P-BJ

Plaintiff,

v.

THE STATE BAR OF TEXAS, ET AL,

Defendants.

**DEFENDANT U.S. BANCORP'S UNOPPOSED MOTION
TO EXTEND THE DEADLINE TO FILE AN ANSWER OR OTHER RESPONSIVE
PLEADING TO PLAINTIFF'S THIRD AMENDED COMPLAINT**

Defendant U.S. Bancorp moves the Court to extend the deadline by which it must file its answer or other responsive pleading to Plaintiff Conghua Yan's Third Amended Complaint (the "Third Amended Complaint") by 30 days, from the current deadline of December 12, 2023 to the new deadline of January 11, 2024.

Plaintiff filed the Third Amended on September 18, 2023 (Dkt. 60), however, a Waiver of Service of Summons as to U.S. Bancorp was not filed until November 2, 2023 (Dkt. 105). The current deadline by which U.S. Bancorp must file its answer or other responsive pleading to the Third Amended Complaint is December 12, 2023. *See* FED. R. CIV. P. 4 (d)(3). U.S. Bancorp respectfully requests an extension of this deadline by 30 days, to January 11, 2024, to allow it adequate time to investigate and respond to the claims alleged in the Third Amended Complaint.

Counsel for U.S. Bancorp conferred with Plaintiff via e-mail on November 20, 2023 regarding this request. Plaintiff graciously confirmed that **Plaintiff is not opposed to the requested extension.**

For the foregoing reasons, U.S. Bancorp respectfully asks that the Court grant this motion

and extend the deadline by which U.S. Bancorp must file its answer or other responsive pleading to the Third Amended Complaint from December 12, 2023 to the new deadline of January 11, 2024.

Respectfully submitted,

Dated: November 21, 2023

/s/ Tyler J. Hill

Tyler J. Hill

Texas Bar No. 24130505

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Plaintiff Conghua Yan on November 20, 2023 regarding the subject matter of this motion and that Plaintiff notified me that he is not opposed to extending by 30 days the deadline by which U.S. Bancorp must file its response to the Third Amended Complaint.

Dated: November 21, 2023

/s/ Tyler J. Hill

Tyler J. Hill

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document was filed via the ECF filing system and therefore served on all counsel and parties of record.

Dated: November 21, 2023

/s/ Tyler J. Hill
Tyler J. Hill